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5 Attorney for Defendant MARKO LEOPARD

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 ***

9 UNITED STATES OF AMERICA,) 2:17-cr-00306-JCM-CVF
10)
Plaintiff,)
11)
v.)
12) **STIPULATION TO CONTINUE**
MARKO LEOPARD,) **MARKO LEOPARD'S**
13) **SENTENCING HEARING**
14 Defendant.) (First Request)
15)
16)

17 IT IS HEREBY STIPULATED by and between the United States of
18 America, by and through the undersigned; and MARKO LEOPARD, Defendant, by
19 and through his counsel, Angela H. Dows, Esq. that the sentencing hearing in the
20 above-entitled matter, currently scheduled for April 28, 2020, at the hour of 10:00
21 a.m., be vacated and continued for approximately ninety (90) days, or to a date and
22 time to be set by this Honorable Court. This is the first request for a continuance
23 in this case. This Stipulation is entered into based upon the following:
24

- 25 1. Defense counsel has been unable to conduct an in-person visit with
26 her client since the COVID-19 pandemic orders have been in effect. Defense

1 counsel requests additional time to be able to review documents with the
2 client prior to the filing of not only the formal objections to the presentence
3 report, but also Mr. Leopard's sentencing memorandum.
4

5 2. Defense counsel is further awaiting one or more letters in support of
6 Mr. Leopard that are anticipated to be sent from Mr. Leopard's home
7 country of Macedonia.
8

9 3. In sum, defense counsel also requests additional time to be able to
10 adequately represent her client in relation to sentencing, including
11 preparing/filing objections, and gathering sentencing information on behalf
12 of the client.
13

14 4. Defendant MARKO LEOPARD has no objection to the continuance
15 after conferring thereon.
16

17 5. For all the above-stated reasons, the ends of justice would best be
18 served by a continuance of the April 28, 2020 sentencing hearing.
19

20 DATED this 15th day of April, 2020.

21 United States Department of Justice
22 By: /s/ Chad W. McHenry
23 DAVID L. JAFFE
24 Chief, Organized Crime and Gang Section
25 KELLY PEARSON
26 Deputy Chief –
Organized Crime and Gang Section
CHAD W. MCHENRY
ALEXANDER B. GOTTFRIED
Trial Attorneys –
Organized Crime and Gang Section
Counsel for Plaintiff

CORY READE DOWS & SHAFER
By: /s/ Angela H. Dows
ANGELA H. DOWS, ESQ.
Appointed Counsel for
Defendant Marko Leopard

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:17-cr-00306-JCM-CVF
)	
Plaintiff,)	
)	
v.)	
)	FINDINGS OF FACT,
)	CONCLUSIONS OF LAW, AND
MARKO LEOPARD,)	ORDER THEREON
)	
Defendant.)	
)	
)	

Based on the pending Stipulation of the parties, and good cause appearing therefore, the Court finds and concludes that:

1. Defendant Marko Leopard requires additional time to prepare for sentencing and meet with his counsel in light of the COVID-19 pandemic affecting in-person visitation;

2. That this is the first request for a continuance of the sentencing date in this case;

3. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and the opportunity

1 within which to be able to effectively and thoroughly prepare for sentencing, taking
2 into account the exercise of due diligence;

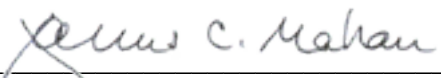
3 4. That counsel for Defendant has conferred with his client, and
4 Defendant Marko Leopard does not object to the requested continuance;

5 5. That for all the above-stated reasons, the ends of justice would best
6 be served by a continuance of the April 28, 2020 sentencing hearing.
7

8 **ORDER**

9 IT IS THEREFORE ORDERED that the sentencing, currently scheduled for
10 April 28, 2020 be vacated and continued to December 8, 2020
11 at the hour of 11:00 a.m.
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13 IT IS SO ORDERED April 17, 2020.
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16 
17 THE HONORABLE JAMES C. MAHAN
18 UNITED STATES DISTRICT COURT JUDGE
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